

SHER TREMONTE LLP

February 15, 2019

VIA ECF

Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Raniere, et al.*, 18 Crim. 204 (NGG)

Dear Judge Garaufis:

I write on behalf of all defendants, and with the consent of the government, to respectfully request a four-day extension of the deadline to file a response to the government's Motion to Admit Enterprise Evidence. Currently, defendants' opposition brief is due on Monday, February 18, and the government's reply is due on Tuesday, February 26. We now respectfully request that defendants be permitted to file their opposition by Friday, February 22, and that the deadline for the government's reply be extended to Tuesday, March 5. The extension is requested so that the defendants can coordinate their opposition submissions and avoid burdening the Court with duplicative filings.

In addition, all parties agree that given the pending motions before the Court, as well as the issues raised by the government's Motion to Admit Enterprise Evidence, it would be sensible to adjust the current schedule for Motions in Limine. Accordingly, defendants and the government respectfully request the following briefing schedule:

- Motions in Limine: March 18
- Responses: March 29
- Replies: April 5

We appreciate the Court's consideration and apologize for any inconvenience.

Respectfully submitted,

/s/ Justine A. Harris

Justine A. Harris

cc: All Counsel (via ECF)